



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

April 28, 2023

BY ECF

Hon. Jesse M. Furman
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

**Re: *United States v. Joshua Adam Schulte,*
S3 17 Cr. 548 (JMF)**

Dear Judge Furman:

The Government respectfully submits this letter to provide the Court with a status update on matters raised at the April 21, 2023, pretrial conference.

The Government has consulted with the Metropolitan Detention Center (“MDC”) and has been advised the following: (1) A hard drive containing the bulk of unclassified discovery was delivered to the defendant by MDC staff on April 25, 2023. The Government also mailed a disc containing a supplemental re-production of discovery materials to the defendant and standby counsel on April 26, 2023. (2) The defendant has access to pens, pencils, and paper, as well as the typewriter that was previously made available to him (*see* D.E. 954, 970). If he requires access to additional pens, paper, pencils, or typewriter ribbon, he has been advised to submit a copout to the SAMs unit team. (3) The Bureau of Prisons (“BOP”) has faced a shortage of stamps in recent weeks, but stamps remain available to the defendant through the commissary. The defendant bought a book of 20 stamps on March 28, 2023, less than four weeks before the April 21, 2023, conference. In addition, as noted at the conference, the defendant has recently mailed letters to the Court and has mailed letters and other filings in various civil actions he has filed against the Government or the BOP. *See, e.g., Schulte v. Warden*, 22 Civ. 766 (EK) (E.D.N.Y.) Dkt. Entry Nos. 16 (*pro se* letter postmarked March 15, 2023) & 17 (*pro se* letter postmarked April 7, 2023); *Schulte v. United States*, 22 Civ. 5841 (EK) (E.D.N.Y.), Dkt. Entry Nos. 14 (*pro se* letter postmarked February 8, 2023), 15 (*pro se* motion dated February 13, 2023), 19 (*pro se* letter postmarked March 15, 2023), 20 (*pro se* letter dated March 17, 2023), & 22 (*pro se* letter dated March 21, 2023).

With respect to the defendant’s access to discovery materials in file formats not supported by MDC computers, the Government has reached out to standby counsel to explore whether the defendant can identify a reasonable subset of the discovery material to trial preparation that could be provided in an alternative format.

Finally, with respect to the defense expert's review of Child Sexual Abuse Materials ("CSAM"), the Government understands that review is currently scheduled to take place between approximately May 15 and 19, 2023. The Government and the FBI have received a list of requests from the defense expert regarding particular forensic artifacts, review platform, review environment and the like and are working to address those requests prior to the scheduled review period.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

by: /s/
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cc: Standby counsel (by ECF)
Joshua Adam Schulte (by U.S. Mail)

The Government shall file a status update on all of these matters no later than May 22, 2023.

SO ORDERED.

May 1, 2023